

REMARKS/ARGUMENTS

Claims 1-20 are pending in the present application. By this reply, claims 15-20 have been added. Claims 1, 6 and 15 are independent claims.

35 U.S.C. § 103 Rejection

Claims 1-2, 6-7 and 10-14 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Yuzawa (U.S. Patent No. 6,549,528) in view of Anderson et al. (U.S. Patent No. 6,229,801). This rejection, insofar as it pertains to the presently pending claims, is respectfully traversed.

Regarding independent claim 1, the Examiner alleges that Yuzawa discloses a memory for storing table IDs and version numbers of sections for each of the table IDs, and a comparison unit for determining matching of a table ID included in a present section with the table IDs stored in the memory upon reception of the present section. Applicant respectfully disagrees.

Yuzawa is directed to a data receiver as shown in Fig. 3 for receiving and processing a data stream having program data (load section). At column 11, lines 26-27, Yuzawa discloses that a table ID is acquired from the received data stream at step S22 of Fig. 8 for processing the received data stream. Then based on the acquired table ID, it is checked whether the received data is a load section at step S23. In other words, there is no feature of comparing a table ID included in a present section with the table IDs stored in the memory.

Furthermore, once it is determined that the read maker ID and the read model ID (as stored in the ROM 21) coincide with the acquired maker ID and the acquired model ID (from the received data stream) at step S24, Yuzawa discloses that the version ID of the program data stored at present in the memory 22 is compared against the acquired version ID from the received data stream. See column 11, lines 51-55 of Yuzawa. In other words, Yuzawa's memory 22 stores only one version ID, i.e., the version ID of the program data stored to date (i.e., before the receipt of the present data stream), and not multiple table IDs and multiple version IDs as required by independent claim 1.

Further, Anderson et al. does not overcome these deficiencies of Yuzawa since Anderson et al. nowhere discloses comparing a table ID of a present section with the table IDs stored in the memory, and comparing the version number of the present section with the stored version number, as pointed out in Applicant's previous arguments.

Therefore, even if the references are combinable, assuming *arguendo*, the combination of references would not teach or suggest at least the above-mentioned features recited in independent claim 1. Independent method claim 6 contains similar subject matter as claim 1 and are thus traversed based on the same reasons as claim 1 as discussed above.

Accordingly, independent claims 1 and 6 and their dependent claims (due to their dependency) are patentable over the applied references, and the rejection should be withdrawn.

Claims 3-5 and 8-9 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Yuzawa in view of Anderson et al. and further in view of Freimann et al. (U.S. Patent No. 6,134,554). This rejection, insofar as it pertains to the presently pending claims, is respectfully traversed.

As discussed above, the combination of Yuzawa and Anderson et al. does not teach or suggest at least the above-noted features recited in independent claims 1 and 6 from which claims 3-5 and 8-9 depend. Furthermore, Friemann et al. does not overcome the deficiencies in these combined references. Freimann et al. does not compare a received table ID with multiple table IDs stored in the memory, but instead compares the received section with a single predetermined value for a particular note, as indicated in Applicant's previous arguments.

Therefore, even if the references were combinable, assuming *arguendo*, the combination of references would still fail to teach or suggest the invention as recited in independent claims 1 and 6 and their dependent claims (due to their dependency). Accordingly, the rejection should be withdrawn.

CONCLUSION

For the foregoing reasons and in view of the above clarifying amendments, Applicant respectfully requests the Examiner to reconsider and withdraw all of the objections and rejections of record, and earnestly solicits an early issuance of a Notice of Allowance.

Should there be any matters which need to be resolved in the present application, the Examiner is respectfully requested to contact Esther H. Chong (Registration No. 40,953) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and further replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

BIRCH, STEWART, KOLASH & BIRCH, LLP

By *Joseph A. Kolasch* #40,953
Joseph A. Kolasch, #22,463

P.O. Box 747
Falls Church, VA 22032-0747
(703) 205-8000

^{an}
JAK/EHC:lmh